

Authorization Basis Amendment Request

Proposed Change Title: Revision to SRD Safety Criteria for ERPP Topic

Proposed Change Number: ABAR-BNFL-5193-SRD-01-02-01 Revision: 0

Originator: D. J. Pisarcik Date: 1-15-99

This Authorization Basis Amendment Request transmits the following documentation:

- (a) Description of the proposed change,
- (b) Reason(s) for the proposed change,
- (c) Description of the proposed implementation schedule,
- (d) Copies of the Authorization Basis documents or appropriate excerpt showing the proposed change,
- (e) Safety evaluation of the proposed change, and
- (f) If the change involves the deletion or modification of a standard previously identified in the approved Safety Requirements Document (SRD):
 - (1) An evaluation that demonstrates the revised SRD continues to identify a set of standards that will provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards; and
 - (2) A certification that the revised SRD identifies a set of standards that continues to provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards.

A. Description of Proposed Change

As a condition of the RU's acceptance of the SRD Revision 1A, 99- RU-0072 (PDC # 000840), Implementing Standards were to be identified for the Safety Criteria related to Environmental Radiation Protection (SRD Sections 5.3 and 5.4). Implementing Standards for the Safety Criteria related to Environmental Radiation Protection (SRD Sections 5.3 and 5.4) have been identified in accordance with the DOE/RL-96-0004 specified process, Letter # 001198, D.J. Pisarcik to D. W. Edwards, "Selection of Standards for the ERPP Topic." In addition, new Safety Criteria were developed to provide clear criteria and standards for the individual technical elements required by Safety Criterion 5.3-1.

As a part of this closure process, three approved Safety Criteria are proposed to be modified. These changes require prior RU Approval and are the subject of this Authorization Basis Amendment Request. This Authorization Basis Amendment Request will be submitted as a part of the Closure Package in Response to Condition 2 of 99-RU-0072.

The three affected Safety Criteria and proposed changes are summarized below:

1. Safety Criterion 5.3-1: G-10 CFR 835/B2 Occupational ALARA Program was deleted as an Implementing Standard. This standard was re-assigned to the new Safety Criterion 5.3-2 discussed below.
2. Safety Criterion 5.3-4: This Safety Criterion has been split into two separate criteria:
 - SC 5.3-4 (revised) addresses design and installation of equipment to monitor and control the release of radioactive materials.
 - SC 5.3-2 (added) addresses ALARA as a process applied to release of radioactive materials to the environment and exposures to the public.
3. Safety Criterion 5.3-6: Revised to clarify that discharges of TWRS-P process radiological material to sanitary sewers are prohibited.

B. Reason(s) for the proposed change

Safety Criterion 5.3-1: This criterion defines the elements of an acceptable Environmental Radiation Protection Program. As such, the appropriate Implementing Standard for this criterion is one which addresses the establishment of an adequate environmental program. G-10 CFR 835/B2 is deleted from SC 5.3-1 because it addresses ALARA which is a specific technical element of the ERPP and is more appropriately included as an Implementing Standard for a Safety Criterion governing the technical aspects of ALARA as an element of the ERPP.

Note: Identification of Implementing Standards for the Safety Criteria of Sections 5.3 and 5.4 are addressed as part of the closure to Condition 2 of 99-RU-0072, and are not part of this Authorization Basis Amendment Request.

Safety Criterion 5.3-4: This Safety Criterion has been split into two separate criteria to provide clear objectives relative to the control of radioactive materials (SC 5.3-4) versus the implementation of ALARA as a process applied to release of radioactive materials to the environment and exposures to the public, (SC 5.3-2). None of the text of the original SC 5.3-4 was deleted.

Safety Criterion 5.3-6: This Safety Criterion was revised to clarify that discharges of TWRS-P process radioactive material to sanitary sewers are prohibited. The original criterion was determined to be more appropriate to a facility such as a laboratory or hospital where discharges of low levels of process-related radioactivity may legally occur. Additionally, the revised criterion acknowledges that an approved ERPP (as required by SC 5.3-1) will be in place and compliance to laws and regulations is required thus negating the need for exception provisions of the final paragraph and sub-items (2) and (3).

C. Implementation schedule

Condition 2 of the RU's Acceptance of the SRD Revision 1A, 99- RU-0072 (PDC # 000840), requires revised Implementing Standards for Safety Criteria of Sections 5.3 and 5.4 of the SRD to be submitted to the RU to provide for RU review and approval by 2/2/99. This ABAR supports closure of this condition and is required to be implemented upon RU approval of the change. The Safety Criteria are applicable throughout the TWRS-P Facility design, construction, and operation.

D. Copies of the Authorization Basis documents showing the proposed change

Markups of the affected Sections of the SRD are provided as a part of the Closure Package for Condition 2 of 99-RU-0072. This markup shows redline/strikeouts highlighting proposed changes as a result of this ABAR as well as the identification of the proposed Implementing Standards required by Condition 2 of 99-RU-0072.

E. Safety evaluation of the proposed change

See attached Safety Evaluation Se-BNFL-5193-SRD-01-02-01.

F(1). Evaluation of Adequacy of the Proposed Changes

The SRD continues to identify a set of standards that, when implemented, will provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards.

Safety Criterion 5.3-1: The deletion of G-10 CFR 835/B2 Occupational ALARA Program as an implementing standard is acceptable for the following reasons:

1. Appropriate Implementing Standards for this Safety Criterion were identified via the BNFL implementation of the Standard Identification Process as documented in Letter # 001198, D.J. Pisarcik to D. W. Edwards, "Selection of Standards for the ERPP Topic.
2. G-10 CFR 835/B2 Occupational ALARA Program is cited as the Implementing Standard for SC 5.3-2 which addresses the technical aspect of ALARA as part the overall ERPP. This change clarifies the intent of identifying this standard relative to item 5 (ALARA) of SC 5.3-1.

Safety Criterion 5.3-4: The complete text of the SC has been separated into two Safety Criteria to better focus the objective of each sentence. No reduction in commitment or intent to the approved SRD criterion is made.

Safety Criterion 5.3-6: This criterion was revised to clarify that discharges of TWRS-P process radioactive material to sanitary sewers are prohibited. The original criterion was determined to be more appropriate to a facility such as a laboratory or hospital where discharges of low levels of process-related radioactivity may legally occur. With this revision the Safety Criteria is more restrictive than the original criteria and thus provides adequate safety. Additionally, the revised criterion acknowledges that an approved ERPP (as required by SC 5.3-1) will be in place and compliance to laws and regulations is required thus negating the need for exception provisions of the final paragraph and sub-items (2) and (3).

F(2). Certification of the Proposed Changes

Certification that the revised SRD identifies a set of standards that continues to provide adequate safety, complies with all applicable laws and regulations, and conforms to top-level safety standards is based on adherence to the DOE/RL-96-0004 Standards Identification Process and successful completion of review and confirmation by the PSC.

TWRS-P General Manager/Designee - Approval

Date